UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
1110 West Washington Street
Phoenix, Arizona 85007

May 3, 2016

Cathy Jerrard
AFCEC/CIBW
706 Hangar Road
Rome, New York 13441

RE: Need for Continued Extraction for Containment at ST-12 Fuels Spill Site, Former Williams Air Force Base, Mesa, AZ.

Dear Ms. Jerrard:

The US Environmental Protection Agency and Arizona Department of Environmental Quality ("The Agencies") previously sent a joint letter dated March 7, 2016 expressing concern that the termination of the Steam Enhanced Extraction System (SEE) at the former ST12 Fuels Spill Site was premature, given the large quantity of LNAPL that could still remain unaddressed at the site. Regardless of our request, the SEE operations were terminated on March 4, 2016. We understand that your contractor, Amec, now intends to terminate the extraction system after only 8 weeks of post steam injection extraction. The regulatory agencies disapprove of termination of the extraction system for the following reasons:

1) The mass of mobile LNAPL remaining behind at the site is still unquantified and uncharacterized.
2) The site is still hot from SEE operations and contaminants are more mobile.
3) The agencies have expressed concern on numerous occasions of the potential for loss of containment of contaminants during the SEE operations, and the concerns have not been addressed through characterization.
4) The water table is now within the more transmissive Cobble Zone and without extraction to reverse the gradient there is nothing to prevent contaminants from spreading widely offsite beyond the reach of the currently proposed EBR treatment.

The Agencies request the Air Force continue to extract and contain the contaminants until the concerns identified above have been satisfactorily addressed. The agencies are deeply concerned that failure to contain the plume and prevent contaminant migration now could create a more serious and costly problem for Air Force to address in the future.

Enclosed is a figure indicating areas for priority characterization to help address these concerns. It is critical for the success of the Enhanced Bioremediation -project to quantify the initial baseline conditions and intial mass to be addressed for any future modeling effort to determine the effectiveness of the EBR application. We do not understand Amec's reluctance to address this concern as expressed in the Base Closure Team (BCT) meeting on April 21, 2016.

Please contact us if you would like to set up a call to discuss.

Sincerely,

Carolyn d'Almeida
Remedial Project Manager, EPA

Wayne Miller
Remedial Project Manager, ADEQ

Enclosure